

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case no. 1:20-cr-037

v.

Hon. Robert J. Jonker
Chief United States District Judge

DANIEL AUGUSTINE SOLIS,

Defendant.

DEFENDANT'S MOTION FOR DOWNWARD DEPARTURE

NOW COMES the defendant, Daniel Augustine Solis, by his attorney, Helen C. Nieuwenhuis of the Office of the Federal Public Defender, to move this Honorable Court to depart downward within the U.S. Sentencing Guidelines pursuant to U.S.S.G. § 5K2.20(a). The basis for this departure will be found in the Presentence Report and in Defendant's Sentencing Memorandum filed on this day as well.

Respectfully submitted,

SHARON A. TUREK
Federal Public Defender

Dated: September 14, 2020

/s/ Helen C. Nieuwenhuis
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